


From: [Bill Jacobs](#)
To: [Dan Peacock](#)
Cc: [Jennifer Gaines](#)
Subject: Re: Rodenticide Use in Sewers, Difenacoum Rat and Mouse Block, EPA Reg. No. 47629-16
Date: 03/15/2010 02:12 PM
Attachments: [\(11\) 5-28-09 EPA Master Label \(Approved - 2-17-09 Amendment\) 47629-16.pdf](#)

I figured the explanation would be something like what you found: no studies run or no studies passed with weathered blocks.

Another circumstance that would result in a wax-block label that prohibited sewer applications would be if the registrant/applicant passed the tests with weathered blocks but did not propose specific directions for applying bait in sewers. If the directions are lacking, the label must permit sewer treatments as not doing so would leave users to their own thoughts regarding sewer use.

▼ Re: Rodenticide Use in Sewers, Difenacoum Rat and Mouse Block, EPA Reg. No. 47629-16

Re: Rodenticide Use in Sewers, Difenacoum Rat and Mouse Block,
EPA Reg. No. 47629-16 

Dan to: Mateer, Chad
Peacock

03/15/2010
01:46 PM

Cc: Jennifer Gaines, Bill Jacobs

Dear Mr. Mateer,

- I checked the efficacy review.
- In the last tests run on 47629-16, the lab used Protocols 1.203 and 1.204 to establish Norway rat , roof rat, and house mouse claims. See our review dated June 3, 2008 and sent to you 6-9-20008.
- These protocols do not require a "weathered bait".
- To be able to claim sewers, you need to repeat the studies, using Protocols 1.213 and 1.214, which use a "weathered bait" to simulate wet or damp conditions.
- If you have any questions about the protocols contact Bill Jacobs (703-305-6406) or Jennifer Gaines (703-305-5967).

Thank You,

Daniel B. Peacock, Biologist

Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch,
Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division,
Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

▼ "Mateer, Chad" ---02/25/2010 09:03:53 AM---Dear Mr. Peacock, I hope all is well with you. I have a question that I was hoping would be easy for

From: "Mateer, Chad" <CMateer@woodstream.com>
To: Dan Peacock/DC/USEPA/US@EPA
Date: 02/25/2010 09:03 AM
Subject: Rodenticide Use in Sewers

Dear Mr. Peacock,

I hope all is well with you. I have a question that I was hoping would be easy for you to answer. I was asked the other day by one of our sales people why our Difenacoum block bait labels display a use restriction for sewers. My short answer to them is that it is on our label because it is on the latest agency accepted master label for the product (attached). However, the reason that the restriction is on the master label is not known to me. Can you explain the reasoning behind this? I am aware that this restriction is not on other block baits. Did Woodstream not provide data that was needed to support use of difenacoum blocks in sewers or did it have something to do with the active?

Thanks in advance for your time. I really appreciate it.

Sincerely,

Chad Mateer
Regulatory Affairs Manager
Woodstream Corp. / 69 N. Locust Street / Lititz, PA 17543
(717) 626 -2125 ext: 426 / cmateer@woodstream.com

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